

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**NOTICE OF DEFENDANTS' MOTION TO COMPEL THE PRODUCTION
OF TESTING AND OTHER MATERIALS IN THE POSSESSION OF
CLASS EXPERT, DR. RON NAJAFI**

PLEASE TAKE NOTICE that on May 16, 2022, or as soon as counsel may be heard, the undersigned Defense Executive Committee counsel, on behalf of all Defendants, shall move for the entry of an Order granting Defendants' Motion to Compel the Production of Testing and Other Materials in the Possession of Class Expert, Dr. Ron Najafi.

PLEASE TAKE FURTHER NOTICE that in support of their motion, the Defendants shall rely upon the Brief in Support submitted herewith, any reply submissions made hereafter, and the Certification of Clem C. Trischler and exhibits thereto; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: April 13, 2022

By: /s/ Clem C. Trischler
Clem C. Trischler
Defense Executive Committee

PIETRAGALLO GORDON ALFANO
BOSICK & RASPANTI, LLP
Clem C. Trischler
Jason M. Reefer
Frank H. Stoy
38th Floor, One Oxford Centre
Pittsburgh, Pennsylvania 15219
Tel: (412) 263-2000
Fax: (412) 263-2001
CCT@PIETRAGALLO.com

*Counsel for Mylan
Laboratories, Ltd. and Mylan
Pharmaceuticals, Inc.*

DUANE MORRIS LLP
Seth A. Goldberg, *Lead Counsel and
Liaison Counsel for Defendants*
Jessica Priselac
Lauren Appel
Coleen W. Hill
Melissa A. Ruth
30 South 17th Street
Philadelphia, Pennsylvania 19103
Tel.: (215) 979-1000
Fax: (215) 979-1020
SAGoldberg@duanemorris.com
JPriselac@duanemorris.com
LAAppel@duanemorris.com
CWHill@duanemorris.com
MARuth@duanemorris.com

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP

Allison Brown

Jessica D. Miller
Four Times Square
New York, Ny 10036
Tel: (212) 735-3222
allison.brown@skadden.com
jessica.miller@skadden.com

*Counsel for Zhejiang Huahai
Pharmaceutical Co, Ltd.,
Huahai U.S., Inc., Princeton
Pharmaceutical Inc., and Solco
Healthcare US, LLC*

GREENBERG TRAURIG, LLP
Lori G. Cohen, *Lead Counsel for
Defendants*
Victoria Davis Lockard
Steven M. Harkins
Terminus 200
3333 Piedmont Road, N.E.,
Suite 2500
Atlanta, Georgia 30305
(678) 553-2100
(678) 553-2386 (facsimile)
CohenL@gtlaw.com
LockardV@gtlaw.com
HarkinsS@gtlaw.com

*Counsel for Teva
Pharmaceuticals USA, Inc.,
Teva Pharmaceutical
Industries Ltd., Actavis
Pharma, Inc., and Actavis LLC*

MORGAN, LEWIS & BOCKIUS
LLP
John P. Lavelle, Jr.
1701 Market Street
Philadelphia, PA 19103
Tel. (215) 963-5000

Fax (215) 963-5001
john.lavelle@morganlewis.com

John K. Gisleson
One Oxford Centre, Thirty-Second
Floor
Pittsburgh, PA 15219
Tel. (412) 560-3300
Fax (412) 560-70001
john.gisleson@morganlewis.com

*Attorneys for Aurobindo Pharma Ltd.,
Aurobindo Pharma USA, Inc., and
Aurolife Pharma LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 13, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Clem C. Trischler
Clem C. Trischler